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and

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Attorneys for Defendants,
Walmart Inc. and Jetson Electric Bikes, LLC

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH)	
Individually and as Parent and Legal Guardian)	
of W.W., K.W., G.W., and L.W., minor children)	
and MATTHEW WADSWORTH,)	
)	Case No. 2:23-cv-00118-NDF
Plaintiffs,)	DECLARATION OF
v.)	EUGENE M. LAFLAMME
WALMART INC. and)	IN SUPPORT OF MOTION
JETSON ELECTRIC BIKES, LLC,)	TO EXCLUDE TESTIMONY
)	OF BILL ROBINSON
Defendants.)	

I, Eugene M. LaFlamme, state as follows:

1. I am an attorney at McCoy Leavitt Laskey LLC located in Waukesha, Wisconsin.

2. I am one of the attorneys of record for Defendants, Jetson Electric Bikes, LLC and Walmart Inc., admitted *pro hac vice* on August 24, 2023.

3. This case involves a February 1, 2022 residential fire in Green River, Wyoming.

4. The primary liability dispute between the parties is whether the fire originated at a Jetson Plasma hoverboard by the bedroom door of G.W. and L.W.'s bedroom or a smoking shed located outside the bedroom window of G.W. and L.W.

5. I attended the depositions of Green River Fire Department Assistant Fire Chief Bill Robinson taken on November 15, 2023.

6. Plaintiffs filed their expert disclosures on July 15, 2024. Bill Robinson was not named or designated as an expert witness.

7. Attached as Exhibit 1 are the pertinent portions of Green River Fire Department Assistant Fire Chief Bill Robinson's deposition taken on November 15, 2023.

8. Attached as Exhibit 2 is a true and correct copy of Assistant Fire Chief Bill Robinson's report dated February 1, 2022, with a supplemental narrative of February 9, 2022, previously marked as Robinson Deposition Exhibit 9.

9. Attached as Exhibit 3 are the pertinent portions of Plaintiffs' origin and cause expert Michael J. Schulz's deposition taken on September 10, 2024.

10. Attached as Exhibit 4 is a true and correct copy of NFPA 921 (2021 ed) sections 3.3.9, 4.2, 4.3 to 4.3.7, 4.4.5, 18.4 and 19.4.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: December 2, 2024



Eugene M. LaFlamme